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Attorneys for Plaintiff  
United States of America



IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

HORACIO TORRECILLAS URIAS JR ET AL.,  
  
Defendants.

CASE NO. 1:22-CR-00062-JLT-SKO

MOTION TO DISMISS WITHOUT PREJUDICE  
CHARGES FOUR AND TEN IN CRIMINAL  
COMPLAINT [~~PROPOSED~~] ORDER

On March 25, 2022, the government filed a criminal complaint in the above-mentioned case, charging 14 defendants with felony drug-trafficking offenses. (Doc. 1, Magistrate case number 1:22-mj-00044-SAB). On April 14, 2022, the grand jury returned a 21-count second superseding indictment, charging the same 14 defendants and several others with felony drug and gun charges. (Doc. 126). And the defendants were arraigned on the second superseding indictment on April 15, 2022.

During the arraignment hearing, the government moved to dismiss, without prejudice, the unindicted counts in the criminal complaint. The court instructed the government to submit a written application and order. By this written application and order, the government moves to dismiss, without prejudice, Counts Four and Ten listed in the criminal complaint:

- Count 4 – charging Horacio Torrecillas Urias Jr. and Alma Garza with attempted distribution of cocaine and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine.

- Count 10 – charging Horacio Torrecillas Urias Jr. and Henry Cox with attempted possession with intent to distribute 400 grams or more of a mixture or substance containing a detectible amount of fentanyl (N-phenyl-N- [ 1- ( 2-phenylethyl ) -4- piperidinyl ] propanamide)

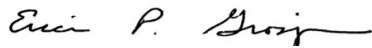
Dated: April 18, 2022

PHILLIP A. TALBERT  
United States Attorney

By: /s/ JUSTIN J. GILIO  
JUSTIN J. GILIO  
Assistant United States Attorney

**~~[PROPOSED]~~ O R D E R**

IT IS SO ORDERED this 19 day of April, 2022.

  
HON. ERICA P. GROSJEAN  
United States Magistrate Judge